

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW MEXICO**

**IN RE:  
EDWIN BACON HALL, MD  
Debtor.**

**No. 11-19-10585 JA**

**OBJECTION OF NAMED UNSECURED CREDITORS AND JOINDER WITH  
STATE OF NEW MEXICO AND US TRUSTEE IN OBJECTION TO APPLICATION  
TO EMPLOY SPECIAL COUNSEL**

COME NOW Unsecured Creditors/ Plaintiffs' Theresa Bunney (POC#4), Ashley Cruz (POC #5), Christopher Ahn (POC # 7) Vicki Benites (POC #9), Barbara Blue (POC #10), Sally Torres (POC #11), Jose Holguin (POC #12), Sandra Garcia (POC # 13) , Dianne Lopez (POC #15), Julian Becker (POC #14), Margaret Plant (POC #16) and Marvin Varela (POC #17) and Marianna Trujillo (POC #18), unsecured creditors with claims against Edwin B. Hall (collectively referred to below as "Named Unsecured Creditors") by and through their attorney Will Ferguson and Associates (Albert N. Thiel, Jr.) and joins with the US Trustee and the State of New Mexico in objecting to the application of Debtor to employ special counsel for Criminal defense Representation, filed June 26, 2019 as Doc 70, stating: from the bankruptcy Estate.

1. The arguments and facts of the US Trustee and State of New Mexico are adopted by reference. The named Unsecured Creditors join in their objections.

2. The Named Objecting Unsecured Creditors are former patients of former Dr. Edwin B. Hall and victims of his use of John Connell, an unlicensed person who surrendered his medical license, to improperly treat his former patients and abandon their care.

3. Edwin B. Hall prepaid a large retainer to defense counsel and made advantageous marital settlement in the wake of civil and possible criminal claims.

4. Debtor should not be allowed to use Estate Assets for his criminal defense and avoid proper settlement of legitimate claims.

WHEREFORE the named unsecured creditors pray the Court to deny the Debtor's Application to Employ Special counsel for Debtor re Defense Representation filed June 17, 2019 as Doc. 64, and that the Court grant such other and further relief as the Court deems just and appropriate.

Respectfully Submitted,

WILL FERGUSON & ASSOCIATES

/s/ Albert N. Thiel, Jr.  
ALBERT N. THIEL, JR.  
*Attorney for Plaintiff*  
1720 Louisiana Blvd., NE, Suite 100  
Albuquerque, NM 87110  
T 505-243-5566 / F 505-243-5699  
[al@fergusonlaw.com](mailto:al@fergusonlaw.com)

I HEREBY CERTIFY on July 8, 2019, I electronically filed the foregoing with the Court via the CM/ECF system. All attorneys and parties identified with the Court for electronic service on the record in this case received service electronically in accordance with the CM/ECF system on the date of filing.

/s/ Albert N. Thiel, Jr.  
Albert N. Thiel, Jr.